

1 MICHELE BECKWITH
2 Acting United States Attorney
3 MATHEW W. PILE, WSBA No. 32245
4 Associate General Counsel
5 Office of Program Litigation, Office 7
6 Social Security Administration
7 MARCELO ILLARMO (MABN 670079)
8 Special Assistant United States Attorney
9 Office of the General Counsel
10 Social Security Administration
11 6401 Security Boulevard
12 Baltimore, Maryland 21235
13 Telephone: (510) 970-4822
14 E-Mail: Marcelo.Illarmo@ssa.gov
15 Attorneys for Defendant

16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**

18 MICHAEL JOSEPH FOWLER, } Case No.: 2:24-cv-03550-DMC
19 Plaintiff, } STIPULATION FOR VOLUNTARY
20 v. } REMAND PURSUANT TO SENTENCE
21 COMMISSIONER OF SOCIAL SECURITY } FOUR OF 42 U.S.C. § 405(g); ORDER
22 Defendant. }

23 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned
24 attorneys, and with the approval of the Court, that the Commissioner of Social Security has
25 agreed to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The
26 purpose of the remand is to offer Plaintiff a new decision.

27 On remand, the Commissioner will offer Plaintiff an opportunity for a hearing; further
28 develop the record as necessary; and issue a new decision. The parties further request that the

1 Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against
2 Defendant, reversing the final decision of the Commissioner.

3
4 Respectfully submitted,

5 Dated: June 16, 2025

/s/ Francesco Paulo Benavides *
(*as authorized via e-mail on 6/16/25)
FRANCESCO PAULO BENAVIDES
Attorney for Plaintiff

8 Dated: June 16, 2025

9 MICHELE BECKWITH
United States Attorney

10 By:

/s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney

11
12 Attorneys for Defendant

13
14
15 **ORDER**

16 Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of
17 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown, IT
18 IS HEREBY ORDERED, ADJUDGED AND DECREED that the above-captioned action is
19 remanded to the Commissioner of Social Security for further proceedings consistent with the
20 terms of the Stipulation to Remand.

21
22 Dated: June 17, 2025

23
24 
DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE